

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

JOSHUA DILLON HAYNES

Defendant.

Case No. 21-CR-594 (TSC)

GOVERNMENT’S SUPPLEMENTAL SENTENCING FILING

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully submits this supplemental sentencing filing. As noted in the government’s sentencing memorandum, one of the offenses to which the defendant pled guilty was 18 U.S.C. § 1363, which is a crime of violence for purposes of the Mandatory Victim Witness Restitution Act (MVRA). *See* 18 U.S.C. § 3663A (b)(1) (the order of restitution shall require that the defendant pay an amount equal to the value of the property on the date of the damage, loss, or destruction, if replacement of the property is not possible, practical, or adequate). The government received an estimate of damages from one of the victims, ZDF, as reflected in the attached exhibits. These exhibits are in German and in Euros, for a total of approximately 21,960, and in U.S. dollars at the current exchange rate would represent an amount of approximately \$23,900. *See Exhibits 1A-1C*. The government will supplement this filing in advance of the hearing if the government receives additional claims for restitution from other victims.

In addition, the government will be submitting as a further exhibit a video of the defendant destroying property on the media staging grounds on January 6, 2021. *See Exhibit 4, “Angry Protestors in Washington, D.C. Attack the ‘Fake News’ Media & Their Equipment,” at 0:55-1:45.*

Respectfully submitted,

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